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1914 – 1999

March 23, 2010

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Ms. Marlene Dortch
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

EX PARTE

Re: A National Broadband Plan for Our Future, GN Docket 09-51
High Cost Universal Service Support, WC Docket 05-337
Developing a Unified Intercarrier Compensation Regime, CC Docket 01-92

Dear Ms. Dortch,

On March 22, 2010, the South Dakota Telecommunications Association (SDTA), the North Dakota Association of Telecommunications Cooperatives (NDATC), various members of the associations, and their counsel, met separately with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell; Angela Kronenberg, Acting Legal Advisor to Commissioner Clyburn; Jennifer Schneider, Senior Policy Advisor and Legal Advisor for Broadband, Wireline, and Universal Service to Commissioner Copps; and Carol Matthey and staff members of the Omnibus Broadband Initiative to discuss the National Broadband Plan, intercarrier compensation, and federal universal service. Meeting with Ms. Kurth and Ms. Kronenberg were the following: from SDTA and its members, Rich Coit, Denny Law, John Tormoehlen; David Crothers from NDATC; and counsel Darla Rogers, Benjamin Dickens and the undersigned. Meeting with Ms. Schneider and Ms. Matthey and staff were the following: from SDTA and its members, Rich Coit, Randy Houdek, Jerry Heiberger and Chad Mutziger; Jeff Wilson from Dickey Rural Networks; and Darla Rogers, counsel.

SDTA and NDATC commented on the widespread availability of broadband services in the areas served by rural incumbent local exchange carriers in South Dakota and North Dakota; the tremendous amount of investment made in broadband networks by the carriers; the need for continued USF programs to support the broadband investments already made by the carriers and

planned by the carriers and the ongoing operations of the carriers; and the need for FCC action to prevent the imposition of a universal service support penalty in those situations where rural telephone company subscribers wish to subscribe only to broadband service, without maintaining their traditional voice line.

In addition, there was a discussion concerning the need to reform intercarrier compensation. The participants stated that it is not unusual for ILECs in South Dakota and North Dakota to obtain 60% or more of their revenues from intercarrier compensation and universal service.

General information concerning SDTA's members was provided. A copy of this information is attached.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS with the Commission's Secretary for inclusion in the above-referenced dockets. Please contact the undersigned if there are any questions concerning this filing.

Respectfully submitted,

/s/ Mary J. Sisak

Mary J. Sisak

Cc:
Christine Kurth
Angela Kronenberg
Jennifer Schneider
Carol Matthey

South Dakota Telecommunications Association **Who are we?**

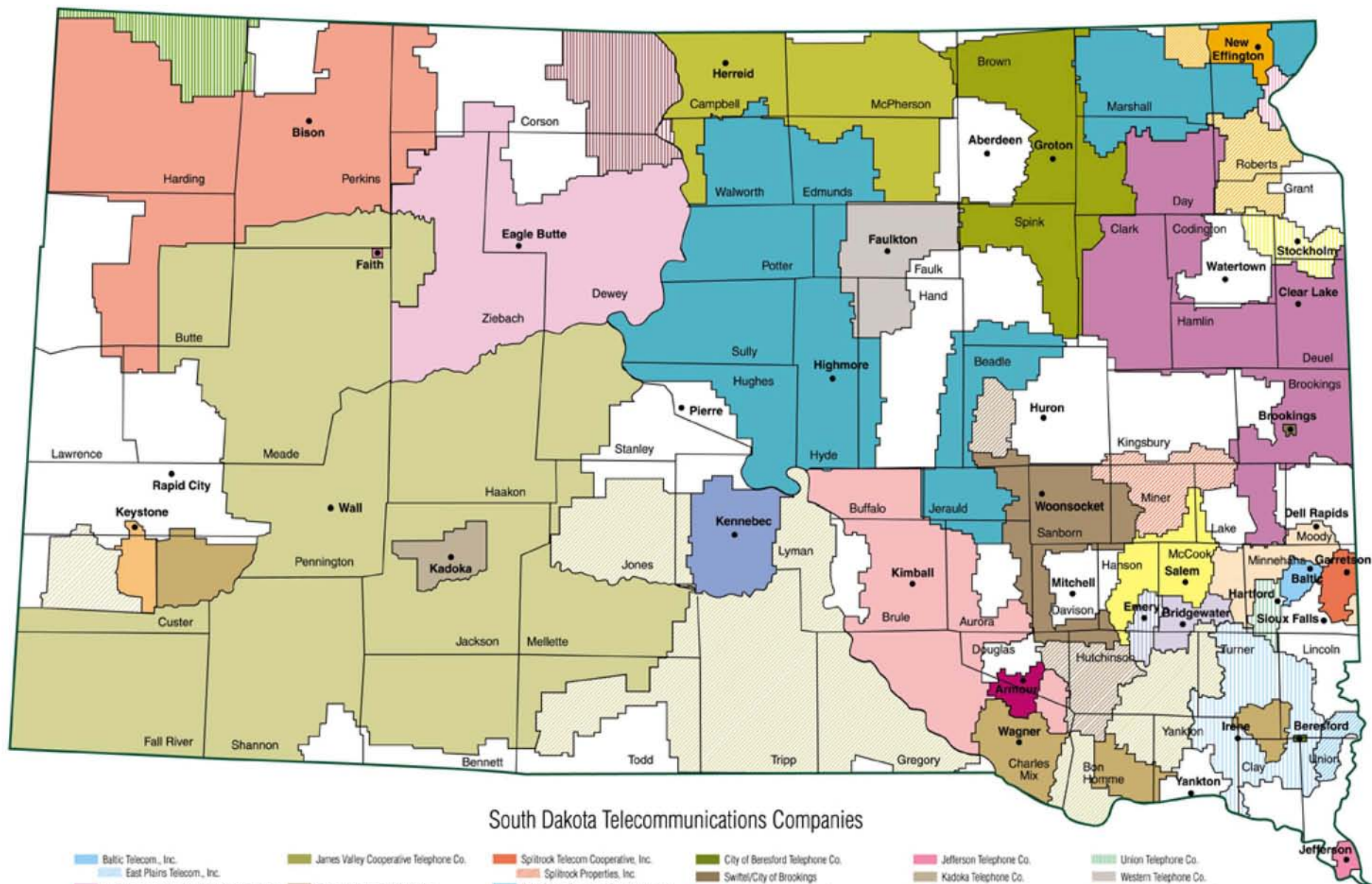
- 20 incumbent landline providers
 - 12 member-owner cooperatives
 - 4 privately-owned companies
 - 2 family-owned companies
 - 2 corporately-owned
 - 3 municipal companies
 - 1 tribal authority



South Dakota Telecommunications Association **Who are we?**

- **Mostly serve small towns and rural areas**
 - **Largest communities we serve are:**
 - Brookings (pop. 18,504)
 - Brandon (pop. 5,693)
 - Hot Springs (pop. 4,129)
 - Pine Ridge (pop. 3,171)
 - **Population density of areas served by SDTA member: approx. 4 people/sq. mile**
 - 11 counties have less than 2 people/sq. mile
 - (sources: U.S. Census Bureau and SD Public Utilities Commission)
 - **West River Telecom, Bison, SD**
 - Service area: 6,209 square miles (28% larger than state of Connecticut)
 - 3,452 access lines
 - .56 lines per square mile





South Dakota Telecommunications Association **Who are we?**

- Our members collectively:
 - serve **79.5% of South Dakota** (service areas cover more than **61,000 square miles**)
 - serve more than 160,000 access lines
 - own more than **21,000 miles of buried fiber optic line**
 - supply broadband service to more than **250 communities** (most with populations of less than 1,000)
 - offer digital video to more than 80 communities
 - provide wireless broadband in select areas





**Thank you for
your time!**

